



Privacy Impact Assessment

SF-52 Tracker

(Minor Application)

Human Resources Center (HRC)

Revision: 1.2

Food Safety and Inspection Service (FSIS)

Date: July 2010



Document Information

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Revision History			
Revision	Date	Author	Comments
0.0.1	September 2007	Andrea Livero-Scott for Dakota Consulting	Initial draft for the HRC System.
0.0.2	September 21, 2007	Andrea Livero-Scott for Dakota Consulting	Update to initial draft based on comments received from Kevin O'Donovan.
0.0.3	April 28, 2009	Olukayode Adeyosoye	Update PIA to 2008 template.
1.0	January 11, 2010	Najib Mirza for CVP	Modified to reflect PIA for Minor App SF-52 Tracker under HRC GSS
1.2	July 20, 2010	Najib Mirza for CVP	Updated to address USDA Concurrency Review and feedback from FSIS Privacy Officer

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1 System Information

System Information	
Agency:	Food Safety and Inspection Services (FSIS)
System Name:	"SF 52 Tracker" (Minor Application under HRC GSS)
System Type:	<input type="checkbox"/> Major Application <input checked="" type="checkbox"/> General Support System <input type="checkbox"/> Non-major Application
System Categorization (per FIPS 199):	<input type="checkbox"/> High <input checked="" type="checkbox"/> Moderate <input type="checkbox"/> Low
Description of System:	<p>The Human Resources Center (HRC) is a general support system (GSS) that consists of 27 Minor Applications which support the mission of the Human Resources Division (HRD) by allowing the staff to perform the numerous HR functions such as administering benefits, managing pay and leave, recruitment, workers compensation etc.</p> <p>"SF-52 Tracker" is one of the minor applications designed to keep a detailed record on the lifecycle of the Federal Form SF-52 (Request for Personnel Action). Allows users to run reports, track and store data on a SF-52. Data is manually entered in from the paper form or scanned in.</p>
Who owns this system? (Name, agency, contact information)	Ken Dewert USDA/FSIS/OM/OCHCO/HRD/HRFO 612-659-8590 ken.dewert@fsis.usda.gov
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2 Data Information

2.1 Data Collection

No.	Question	Response
1	Generally describe the data to be used in the system.	"SF-52 Tracker" is one of the minor applications designed to keep a detailed record on the lifecycle of the Federal Form SF-52 (Request for Personnel Action). Allows users to run reports, track and store data on a SF-52. Data is manually entered in from the paper form or scanned in.
2	Does the system collect Social Security Numbers (SSNs) or Taxpayer Identification Numbers (TINs)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 3.
2.1	State the law or regulation that requires the collection of this information.	<p>Each USDA mission area, agency, and staff office shall create and maintain proper and adequate documentation of the organization, functions, policies, decisions, procedures, and essential transactions of the Department of Agriculture (Department) to protect the legal and financial rights of the Government and of persons directly affected by the Department's activities (44 U.S.C. 3101).</p> <p>US Code TITLE 7, CHAPTER 55 - 2204 states that the Secretary of Agriculture may conduct any survey or other information collection, and employ any sampling or other statistical method, that the Secretary determines is appropriate.</p> <p>This information is requested under authority of sections 301, 3301, and 8506 of title 5, U.S. Code. Sections 301 and 3301 authorize OPM and agencies to issue regulations with regard to employment of individuals in the Federal service and their records, while section 8506 requires agencies to furnish the specific reason for termination of Federal service to the Secretary of Labor or a State agency in connection with administration of unemployment compensation programs.</p> <p>Also see: 5 U.S.C. Chapter 552, 44 U.S.C. Chapters 21, 29, 31, and 33 (Records Management), and 18 U.S.C. 2071, 44 U.S.C. 3101 et seq., 44 U.S.C. 3506, Title 7 CFR 2.37, 36 CFR Chapter 12, Subchapter B, 36 CFR Part 1234, eGovernment Act of 2002 (Pub. L. 107-347, 44 U.S.C. Ch. 36), OMB Circular A-130, NARA - Disposition of Federal Records: A Records Management Handbook, NARA General Records Schedules.</p>



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No.	Question	Response
3	Is the use of the data both relevant and necessary to the purpose for which the system is being designed? In other words, the data is absolutely needed and has significant and demonstrable bearing on the system's purpose as required by statute or by Executive order of the President.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No This system supports the mission of the Human Resources Division (HRD) by allowing the staff to perform HR functions.
4	Sources of the data in the system.	Request for personnel action form SF-52 form filled by the relevant individual.
4.1	What data is being collected from the customer?	Personal Information: <input checked="" type="checkbox"/> Name <input type="checkbox"/> Date of birth <input type="checkbox"/> Social Security Number (or other number originated by a government that specifically identifies an individual) <input checked="" type="checkbox"/> Employee ID <input checked="" type="checkbox"/> HR ID <input checked="" type="checkbox"/> Occupational Code <input checked="" type="checkbox"/> Position Title <input checked="" type="checkbox"/> Location of Position <input checked="" type="checkbox"/> Mailing address <input checked="" type="checkbox"/> Phone numbers (e.g., phone, fax, and cell) Medical notes <input checked="" type="checkbox"/> Employment status and/or records <input checked="" type="checkbox"/> Other: Dates of employment <input checked="" type="checkbox"/> Other: Benefits Information Other: Duty station locality / codes <input type="checkbox"/> Other: Series / Grade <input checked="" type="checkbox"/> Other: SF-50 Actions / History of Actions <input type="checkbox"/> Other: Race / National Origin (RNO) No minor application has every one of these pieces of information. Additional information for each HRC Minor Application is provided in Appendix B, <i>Non-Major Application Certification Template</i>
4.2	What USDA agencies are providing data for use in the system?	Food Safety and Inspection Service (FSIS)
4.3	What state and local agencies are providing data for use in the system?	N/A
4.4	From what other third party sources is data being collected?	N/A
5	Will data be collected from sources outside your agency? For example, customers, USDA sources (i.e., NFC, RD, etc.) or Non-USDA sources.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 6.



No.	Question	Response
5.1	How will the data collected from customers be verified for accuracy, relevance, timeliness, and completeness?	
5.2	How will the data collected from USDA sources be verified for accuracy, relevance, timeliness, and completeness?	
5.3	How will the data collected from non-USDA sources be verified for accuracy, relevance, timeliness, and completeness?	

2.2 Data Use

No.	Question	Response
6	Individuals must be informed in writing of the principal purpose of the information being collected from them. What is the principal purpose of the data being collected?	Maintain a detailed record on the lifecycle of the Federal Form SF-52 (Request for Personnel Action). Allows users to run reports, track and store data on SF-52 information.
7	Will the data be used for any other purpose?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 8.
7.1	What are the other purposes?	
8	Is the use of the data both relevant and necessary to the purpose for which the system is being designed? In other words, the data is absolutely needed and has significant and demonstrable bearing on the system's purpose as required by statute or by Executive order of the President	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Allows users to run reports, track and store data on SF-52 information.
9	Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected (i.e., aggregating farm loans by zip codes in which only one farm exists.)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 10. Information provided to this system is collected on a paper form. Data is manually entered in from the paper form or scanned in.
9.1	Will the new data be placed in the individual's record (customer or employee)?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
9.2	Can the system make determinations about customers or employees that would not be possible without the new data?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A



No.	Question	Response
9.3	How will the new data be verified for relevance and accuracy?	N/A



No.	Question	Response
10	Individuals must be informed in writing of the routine uses of the information being collected from them. What are the intended routine uses of the data being collected?	<p>Information may be disclosed to an appropriate agency, whether Federal, State, or local, charged with the responsibility of investigating or prosecuting a violation of law, rule, or regulation, or order issued pursuant thereto, when information available indicates a violation or potential violation of law, whether civil, criminal, or regulatory in nature and whether arising by general statute or particular program statute, or by rule, regulation, or order issued pursuant thereto, if the information disclosed is relevant to any enforcement, regulatory, investigative, or prosecutorial responsibility of the receiving entity.</p> <p>Information may be disclosed to the Department of Justice for the defense of suits against the United States or its officers, or for the institution of suits for the recovery of claims by the United States Department of Agriculture.</p> <p>Record may be disclosed to a court or adjudicative body in a proceeding when: (a) the agency or any component thereof; or (b) any employee of the agency in his or her official capacity; or (c) any employee of the agency in his or her individual capacity where the agency has agreed to represent the employee; or (d) the United States Government, is a party to litigation or has an interest in such litigation, and by careful review, the agency determines that the records are both relevant and necessary to the litigation and the use of such records is therefore deemed by the agency to be for a purpose that is compatible with the purpose for which the agency collected the records.</p> <p>Information may be disclosed to a Member of Congress or to a Congressional staff member in response to an inquiry of the Congressional office made at the written request of the constituent about whom the record is maintained. In such cases, however, the Member's right to a record is not greater than that of the individual.</p> <p>Records from this system of records may be disclosed to the National Archives and Records Administration and to the General Services Administration for records management inspections conducted under 44 U.S.C. 2904 and 2906</p> <p>Information may be disclosed to agency contractors, experts, and consultants or volunteers who have been engaged by the agency to assist in the performance of a service related to this system of records and who need to have access to the records in order to perform the activity. Recipients shall be required to comply with the requirements of the Privacy Act of 1974, as amended, pursuant to 5 U.S.C. 552a(m).</p> <p>To appropriate agencies, entities, and persons when (1) [the agency] suspects or has confirmed that the security or confidentiality of information in the system of records has been compromised; (2) the Department has determined that as a result of the suspected or confirmed compromise there is a risk of harm to economic or property interests, identity theft or fraud, or harm to the security or integrity of this system or other systems or programs (whether maintained by the Department or another agency or entity) that rely upon the compromised information; and (3) the disclosure made to such agencies, entities, and persons is reasonably necessary to assist in connection with the Department's efforts to respond to the suspected or confirmed compromise and prevent, minimize, or remedy such harm.</p>



No.	Question	Response
11	Will the data be used for any other uses (routine or otherwise)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 12.
11.1	What are the other uses?	
12	Automation of systems can lead to the consolidation of data – bringing data from multiple sources into one central location/system – and consolidation of administrative controls. When administrative controls are consolidated, they should be evaluated so that all necessary privacy controls remain in place to the degree necessary to continue to control access to and use of the data. Is data being consolidated?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 13.
12.1	What controls are in place to protect the data and prevent unauthorized access?	
13	Are processes being consolidated?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 14.
13.1	What controls are in place to protect the data and prevent unauthorized access?	

2.3 Data Retention

No.	Question	Response
14	Is the data periodically purged from the system?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 15.
14.1	How long is the data retained whether it is on paper, electronic, in the system or in a backup?	The retention period is based on a combination business need (i.e., how long do we need this information for our business process) and long term usefulness. During this period, the stored information may be viewed by unauthorized persons.



No.	Question	Response
14.2	What are the procedures for purging the data at the end of the retention period?	<p>Officials may not dispose of records prior to their authorized disposal date or retain them beyond that date except in situations in which records might be relevant to pending or threatened litigation. If a program official determines that records need to be retained longer than authorized by the schedule, the mission area, agency or staff office records officer shall be contacted to obtain approval from NARA and, if necessary, to revise the schedule.</p> <p>The actions taken regarding records and non-records no longer needed for current Government business include transfer to agency storage facilities or Federal records centers, transfer from one Federal agency to another, transfer of permanent records to the National Archives, and disposal of temporary records. For non-records, these actions include screening and destruction.</p> <p>Destruction is the primary type of disposal action and can include burning, shredding, deleting, or discarding with other waste materials. In the electronic realm, destruction is typically accomplished by overwriting or degaussing, depending on security requirements.</p>
14.3	Where are these procedures documented?	http://www.ocio.usda.gov/records/doc/DR3080-001.htm .
15	While the data is retained in the system, what are the requirements for determining if the data is still sufficiently accurate, relevant, timely, and complete to ensure fairness in making determinations?	<p>The nature of data processed by SF 52 tracker is such that it does not change, the minor app just tracks the processing of federal form SF 52.</p> <p>The furnishing of this information is voluntary and done by the record holder by filling out the required form. The content of this system is not intended to constitute a set of legally binding requirements. Requestors bear the 'burden of proof' with respect to the necessity for correction as well as with respect to the type of correction they seek. However, the Food Safety and Inspection Service may be unable to process, in a timely fashion or at all, requests that omit one or more of the requested elements.</p>



No.	Question	Response
16	Is the data retained in the system the minimum necessary for the proper performance of a documented agency function?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No These records will be maintained until they become inactive, at which time they will be destroyed or retired in accordance with the Department's published records disposition schedules, as approved by the National Archives and Records Administration (NARA). (http://www.ocio.usda.gov/records/policy.html DR 3080-1 Records Disposition) FSIS keeps accurate accounts of when and to whom it has disclosed personal records. This includes contact information for the person or agency that requested the personal records. These accounts are to be kept for five years, or the lifetime of the record, whichever is longer. Unless the records were shared for routine use purposes, the accounts of the disclosures should be available to the data subject upon request. The disposition instructions in mission area, agency or staff office record schedules are mandatory.

2.4 Data Sharing

No.	Question	Response
17	Will other agencies share data or have access to data in this system (i.e., international, federal, state, local, other, etc.)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 18.
17.1	How will the data be used by the other agency?	
17.2	Who is responsible for assuring the other agency properly uses the data?	
18	Is the data transmitted to another agency or an independent site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 19.
18.1	Is there appropriate agreement in place to document the interconnection and ensure the PII and/or Privacy Act data is appropriately protected?	
19	Is the system operated in more than one site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 20.
19.1	How will consistent use of the system and data be maintained in all sites?	

2.5 Data Access

No.	Question	Response
20	Who will have access to the data in the system (i.e., users, managers, system administrators, developers, etc.)?	<input checked="" type="checkbox"/> Users <input checked="" type="checkbox"/> Administrators <input type="checkbox"/> Developers <input type="checkbox"/> Contractors <input type="checkbox"/> Others: <input type="checkbox"/> Others: Only internal Human Resource Field Office (HRFO) users have access to the data for day-to-day operations and support of the mission.
21	How will user access to the data be determined?	Access is provided only on a need-to-know basis and if the job requires it. Authorized employees are assigned level-of-access roles based on their job functions. Roles limit the update and printing capabilities to those deemed necessary for specified job functions. Multiple levels of access exist based on the authorized user's role and job function. The level of access for the user restricts the data that may be seen and the degree to which data may be modified by the user.
21.1	Are criteria, procedures, controls, and responsibilities regarding user access documented?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
22	How will user access to the data be restricted?	Access is provided only on a need-to-know basis and if the job duties require it. Based on roles through the USDA e-Authentication program. USDA eAuthentication accounts allow users to do business with the government online. They provide access to authenticated sites (those that require passwords) that track contracts, programs, and services that involve users as a customer or technical service provider.
22.1	Are procedures in place to detect or deter browsing or unauthorized user access?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Only internal users have access to the data. Both logical and physical access to SF 52 Tracker minor app is strictly controlled. An annual user access agreement also describes prohibited activities such as browsing. Activity for the tested and authorized users is monitored, logged, and audited. All users are required to undergo Department-approved computer security awareness training prior to access and must complete computer security training yearly in order to retain access.



No.	Question	Response
23	Does the system employ security controls to make information unusable to unauthorized individuals (i.e., encryption, strong authentication procedures, etc.)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Access is provided only on a need-to-know basis and if the job duties require it. Based on roles through the USDA e-Authentication program. USDA eAuthentication accounts allow users to do business with the government online. They provide access to authenticated sites (those that require passwords) that track contracts, programs, and services that involve users as a customer or technical service provider.

2.6 Customer Protection

No.	Question	Response
24	Who will be responsible for protecting the privacy rights of the customers and employees affected by the interface (i.e., office, person, departmental position, etc.)?	The Program Manager Ken Dewert is responsible for protecting the privacy rights of individuals affected by the interface.



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No.	Question	Response
25	How can customers and employees contact the office or person responsible for protecting their privacy rights?	<p>The Program Manager's contact information is as follows:</p> <p>Ken Dewert Butler Square West, 4th Floor 100 N. Sixth Street, Minneapolis, MN 55403 612-659-8590 ken.dewert @fsis.usda.gov</p> <p>Technical service users can contact the USDA at 1-877-Pii2You or 1-888-926-2373, 24 hours a day, and then contact the FSIS Service Desk at 1-(800) 473-9135.</p> <p>Individuals who have reason to believe that this system might have records pertaining to them should write to the FSIS FOIA Officer at FSIS Freedom of Information Act Office Room 1140, 1400 Independence Avenue, SW Washington, DC 20250-3700 - Phone: (202) 690-3882 Fax (202) 690-3023 - Email: fsis.foia@usda.gov.</p> <p>The FOIA requestor must specify that he or she wishes the records of the system to be checked. At a minimum, the individual should include: name; date and place of birth; current mailing address and zip code; signature; a brief description of the circumstances that caused the creation of the record (including the city and/or country and the approximate dates) which gives the individual cause to believe that this system has records pertaining to him or her.</p>
26	A "breach" refers to a situation where data and/or information assets are unduly exposed. Is a breach notification policy in place for this system?	<p><input checked="" type="checkbox"/> Yes – If YES, go to question 27. <input type="checkbox"/> No</p> <p>The USDA Breach Incident Response Policy (http://www.ocio.usda.gov/directives/doc/DM3505-000.htm) covers notification for this system.</p>
26.1	If NO, please enter the Plan of Action and Milestones (POA&M) number with the estimated completion date.	N/A

No.	Question	Response
27	<p>Consider the following:</p> <ul style="list-style-type: none"> Consolidation and linkage of files and systems Derivation of data Accelerated information processing and decision making Use of new technologies <p>Is there a potential to deprive a customer of due process rights (fundamental rules of fairness)?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 28.
27.1	Explain how this will be mitigated?	
28	How will the system and its use ensure equitable treatment of customers?	The system includes management controls that are reviewed by the respective supervisors, managers, and auditors to determine accuracy, relevance, timely, and completeness to ensure fairness in making decisions and discharging assigned duties.
29	Is there any possibility of treating customers or employees differently based upon their individual or group characteristics?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 30
29.1	Explain	

3 System of Record

No.	Question	Response
30	Can the data be retrieved by a personal identifier? In other words, does the system actually retrieve data by the name of an individual or by some other unique number, symbol, or identifying attribute of the individual?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 31
30.1	How will the data be retrieved? In other words, what is the identifying attribute (i.e., employee number, social security number, etc.)?	Data is retrieved using either the Employee_ID or HR_ID.
30.2	Under which Systems of Record (SOR) notice does the system operate? Provide number, name and publication date. (SORs can be viewed at www.access.GPO.gov .)	SORN will not be published as data involved in SF-52 is not from the general public.
30.3	If the system is being modified, will the SOR require amendment or revision?	<input type="checkbox"/> Yes <input type="checkbox"/> No

4 Technology

No.	Question	Response
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No.	Question	Response
31	Is the system using technologies in ways not previously employed by the agency (e.g., Caller-ID)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, the questionnaire is complete.
31.1	How does the use of this technology affect customer privacy?	



5 Completion Instructions

Upon completion of this Privacy Impact Assessment for this system, the answer to OMB A-11, Planning, Budgeting, Acquisition and Management of Capital Assets, Part 7, Section E, Question 8c is:

1. Yes

PLEASE SUBMIT A COPY TO THE OFFICE OF THE ASSOCIATE CHIEF
INFORMATION OFFICE FOR CYBER SECURITY.



Privacy Impact Assessment Authorization

Memorandum

I have carefully assessed the Privacy Impact Assessment for the

SF 52 Tracker (Minor App under HRC GSS)

(System Name)

This document has been completed in accordance with the requirements of the E-Government Act of 2002.

We fully accept the changes as needed improvements and authorize initiation of work to proceed. Based on our authority and judgment, the continued operation of this system is authorized.

Ken Dewert
System Manager/Owner
OR Project Representative
OR Program/Office Head.

Date

Agency's Chief FOIA Officer
OR Senior Official for Privacy
OR Designated privacy person

Date

Agency OCIO

Date